

REMARKS

This is a full and timely response to the non-final Office action mailed February 23, 2005. Reexamination and reconsideration in view of the foregoing amendments and following remarks is respectfully solicited.

Claims 1-40 are pending in this application, with Claims 1 and 21 being the independent claims. Claim 5 has been cosmetically amended herein. No new matter is believed to have been added.

Before proceeding to the claim objections and rejections delineated in the Office action, Applicant would like to thank Examiner Betz for indicating that Claims 5-8, 20, 25-28, and 40 are directed to allowable subject matter.

Objection to the Claims

Claim 5 was objected to due to a minor informality therein. Specifically, the term "edge point" was erroneously written as "edge point image point." In response, Applicant has amended Claim 5 to remove this informality. As such, Applicant respectfully requests reconsideration and withdrawal of the claim objection.

Rejections Under 35 U.S.C. § 103

Claims 1-4, 9, 11-19, 21-24, 29, and 31-39 were rejected under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 6,396,507 (Kaizuka et al.), and Claims 10 and 30 were rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Kaizuka et al. and U.S. Patent No. 5,583,984 (Conrad et al.). These rejections are respectfully traversed.

Independent Claim 1 relates to a method of changing the relative size of an image that is at least partially displayed in a display area defined by one or more edges of a display, and that includes selecting a zoom point in the displayed image that corresponds to a point in the displayed image that is to be zoomed and recites, *inter alia*, changing the relative size of the selected zoom point while translating the selected zoom point along a substantially straight zoom line that passes through the selected zoom point and extends

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between a central point in the display area and an edge point on the display area that is closest to the selected zoom point.

Independent Claim 21 relates to a display device that includes a user interface, a display screen having one or more edges that define an image display area in which a displayed image may be rendered, and a processor coupled receive commands from the user interface and recites, *inter alia*, that the processor is operable, in response to the commands, to (i) select a zoom point in the displayed image that corresponds to a point in the displayed image that is to be zoomed and (ii) change the relative size of the selected zoom point while translating the selected zoom point along a substantially straight zoom line that passes through the selected zoom point and extends between a central point in the display area and an edge point on the display area that is closest to the selected zoom point.

Kaizuka et al. relates to a system and method for, among other things, zooming an image, and discloses a method of image zooming that includes designating a region to be enlarged from the entire image displayed in a display frame, setting a drawing region by interpolating the space between four corners of the designated region and those of the display frame, zooming the image in the designated region to the size of the drawing region, and displaying the zoomed image. Thereafter, it is determined whether the image in the designated region is enlarged to the entire display frame. If not, the interpolation ratio is increased and the same processing is performed again.

It is thus clear that Kaizuka et al. fails to disclose, or even remotely suggest, at least the above-identified features of independent Claims 1 and 21. Indeed, the Office action expressly acknowledges this fact. However, the Office action also alleges that the above-noted features of independent Claims 1 and 21 would have been obvious because “the shortest distance between two points is a straight line.” While this is generally true, it is unclear how this generally applicable fact provides motivation to modify any image zooming process, let alone the one disclosed in Kaizuka et al. Moreover, even assuming *arguendo* that one would apply this general principle, it is unclear why the skilled artisan would choose “a substantially straight zoom line that passes through the selected zoom point and extends between a central point in the display area and an edge point on the

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display area that is closest to the selected zoom point," rather than some other arbitrary straight line.

It is a basic tenet of patent law that three basic criteria must be met in order to establish a *prima facie* case of obviousness: (1) there must be some suggestion or motivation, either in cited references or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or to combine reference teachings; (2) there must be a reasonable expectation of success; and (3) the cited references must teach or suggest all the claim features. Here, as was noted above, there simply is no suggestion or motivation to modify the cited reference so as to obtain all of the features recited in at least independent Claims 1 and 21.

As regards Conrad et al., this citation relates to a system and method for finding, moving, and copying objects in a computer system having a graphical user interface, and is not understood to make up for at least the above-noted deficiency of Kaizuka et al.

In view of the foregoing, reconsideration and withdrawal of the § 103 rejections is respectfully solicited.

#### Conclusion

Based on the above, independent Claims 1 and 21 are patentable over the citations of record. The dependent claims are also submitted to be patentable for the reasons given above with respect to the independent claims and because each recite features which are patentable in its own right. Individual consideration of the dependent claims is respectfully solicited.

The other art of record is also not understood to disclose or suggest the inventive concept of the present invention as defined by the claims.

Hence, Applicant submits that the present application is in condition for allowance. Favorable reconsideration and withdrawal of the objections and rejections set forth in the above-noted Office Action, and an early Notice of Allowance are requested.

If the Examiner has any comments or suggestions that could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the below-listed number.

May. 13. 2005 9:11AM INGRASSIA FISHER & LORENZ PC.

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If for some reason Applicant has not paid a sufficient fee for this response, please consider this as authorization to charge Ingrassia, Fisher & Lorenz, Deposit Account No. 50-2091 for any fee which may be due.

Respectfully submitted,

INGRASSIA FISHER & LORENZ

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